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ABSTRACT

To increase attendance rates and to decrease dropout rates in New York State, the state legislature established the Attendance Improvement and Dropout Prevention Program in 1984. The State Office of the Comptroller audited the State Department of Education's administration of the program from July 1, 1992 through April 30, 1994. The Comptroller's office found that the Department of Education has opportunities to strengthen its guidance and monitoring of the 19 school districts' programs which could enhance statewide prevention efforts. The Department needs to ensure that participating districts submit the required plans and reports, and it needs to ensure that the reports it receives are complete. The Department further needs to review the submitted plans and to provide districts with technical guidance showing how goals and outcomes should be developed. Review of program services in New York City and Buffalo indicated that program services were provided to students, but the accuracy of attendance data should be improved, and better standards should be established for when and how often attendance outreach services should be provided. Appendixes list report contributors and provide comments of officials in the Department of Education. An exhibit provides summary information about participating districts. (Contains three tables.) (SLD)

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STATE EDUCATION DEPARTMENT

ADMINISTRATION OF THE GUIDANCE IMPROVEMENT DROPOUT PREVENTION PROGRAM

REPORT 94-S-48

H. Carl McCall
Comptroller

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State of New York
Office of the State Comptroller

Division of Management Audit

Report 94-S-48

Mr. Carl T. Hayden
Chancellor
The University of the State of New York
State Education Building
Albany, NY 12234

Dear Mr. Hayden:

The following is our report on the State Education Department's oversight of the Attendance Improvement and Dropout Prevention Program.

This audit was performed pursuant to the State Comptroller's authority as set forth in Section 1, Article V of the State Constitution and Section 8, Article 2 of the State Finance Law. Major contributors to the report are listed in Appendix A.

Office of the State Comptroller
Division of Management Audit

April 24, 1995

Executive Summary

State Education Department Administration of the Attendance Improvement and Dropout Prevention Program

Scope of Audit

In the early 1980's New York State had one of the highest high school dropout rates in the nation. To increase attendance rates and decrease dropout rates, the State Legislature established the Attendance Improvement and Dropout Prevention Program (Program) in 1984. From 1984 to 1992, the State provided categorical aid for the Program to the districts whose attendance rates were among the lowest 10 percent in the State. About 70 school districts received Program aid annually through the 1992-93 school year.

Beginning with the 1993-94 school year, the Legislature limited the Program to 19 districts, which were required to set aside a specified portion of their comprehensive (general) operating aid exclusively for their local AI/DP programs. During the 1993-94 school year, about $47 million was to be distributed to the 19 eligible districts. In total, the State has spent nearly $439 million on the program over the last decade. The State Education Law (Law) requires all of the participating Program districts (including each community school district [CSD] of the New York City Board of Education [NYCBE]) to submit Program plans and reports to the State Education Department (Department) yearly. The Law also requires the Department to submit a report on the Program to the Legislature each year.

There has been some improvement in the State's average daily attendance rate since the Program began. For 1983-84, the year before the Program went into effect, the statewide attendance rate, as reported by the Department, was 90.3 percent. By 1991-92, the statewide attendance rate had increased to 91.6 percent. Also, from the 1985-86 year through the 1991-92 year, the reported statewide dropout rate decreased from 5 percent to 4 percent.

We audited the Department's administration of the Program for the period July 1, 1992 through April 30, 1994. Our audit sought to address the following questions:

- Have the Department and the districts participating in the Program complied with the applicable provisions of the Law?

- Can the Department improve the effectiveness of the Program by strengthening its guidance and oversight of districts' Program efforts?

Audit Observations and Conclusions

We found that the Department has opportunities to strengthen its guidance and monitoring of school districts' Programs, which could enhance the effectiveness of the Statewide Program efforts. Specifically, the Department needs to ensure that participating districts submit the required Program plans and reports. As of February 2, 1994, the Department had not received six districts' plans for the 1993-94 year. Also, 15 districts had not submitted the required Program report for the 1992-93 year. (see pp. 5-7)

The Law and the Commissioner's Regulations prescribe 12 components that must be included in each districts' plan. However, 44 of the 45 plans we reviewed lacked between one and seven of the prescribed elements. For example, 26 district plans did not include detailed procedures for reviewing attendance and academic records for all students during the two-year period prior to high school. Also, 24 plans did not identify how the district would perform the required examination of district practices to assess Program effectiveness. Also, Department staff had reviewed only 8 of the 44 Program plans submitted by the districts as of February 28, 1994, more than halfway through the 1993-94 school year. (see pp. 7-9)

We also found that the districts' Program plans generally did not contain meaningful performance goals and outcomes. Moreover, the goals established by some districts did not identify a specific amount of improvement that officials hoped to achieve. Reaching a general goal of "improving attendance" may provide a false sense of program success when there is a small increase in attendance that may be caused by non-Program factors. To help ensure that districts establish meaningful performance goals, the Department needs to provide districts with technical guidance showing how appropriate goals and outcomes should be developed. (see pp. 9-11)

We also conducted reviews of the Programs at the NYCBE and the Buffalo City School District and determined that Program services were provided to students. However, district managers could strengthen their programs by improving the accuracy of attendance data for students placed in Programs. In addition, officials need to establish minimum standards for when and how often attendance outreach services should be provided. Officials should also ensure that there is adequate supporting documentation that prescribed Program services have been provided. At the NYCBE, officials should determine why minimum attendance goals established by the Chancellor of the NYCBE, have not been achieved. (see pp. 13-26)

Comments of Department Officials

Department officials agreed with each of the report's recommendations and indicated the actions they will take to implement them. Officials also indicated that budget reductions will limit their ability to implement certain recommendations.

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Exhibit A

State Education Department
Attendance Improvement and Dropout Prevention Program
Summary of Participating Districts and Program Funding Amounts
For the 1993-94 School Year

Appendix A

Major Contributors to This Report

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Comments of Department Officials

Introduction

Background

In the early 1980s, New York State had one of the highest high school dropout rates in the nation. To improve attendance rates and reduce dropout rates in New York schools, the State Legislature established the Attendance Improvement and Dropout Prevention Program (Program) in 1984 by enacting new subsections to Section 3602 of the State Education Law (Law). School districts' eligibility for Program aid is based upon student attendance. From 1984 to 1992, the State provided categorical Program aid for the districts whose attendance rates were among the lowest 10 percent of the districts in the State. Seventy school districts qualified annually for Program aid through the 1992-93 school year.

In 1993, the Legislature changed the Law significantly. Beginning with the 1993-94 school year, the State Program was limited to 19 districts. The aid formulas for the eligible districts included special components which provided for the funding of those districts' Programs. Based on 1991-92 attendance figures, only those districts that were identified both as being among the lowest 10 percent in attendance rates and as having an average of at least 462 absences each day are eligible. As a result, most of the 19 districts are large city districts with a large number of students (see Exhibit A).

The Regulations of the Commissioner of Education (Regulations) require an eligible school district to annually submit an application to the State Education Department (Department) to provide the following information: the amount of local funding to be expended for attendance improvement and dropout prevention purposes, the coordination of Program services with those of other school and community groups, the eligible buildings to be served, the procedures to be used to identify the target population, and a budget with details of the projected expenditure of State funds.

Although districts must target schools with attendance rates below the district average and use 40 percent of Program funds for middle/junior high students, district officials can otherwise use such funds at their discretion. Consequently, a variety of approaches and strategies have been used with at-risk students across all grade levels. These include counseling, home visits and other techniques considered appropriate by district officials.

The amount of State Program aid distributed to the 70 districts increased from $28 million in 1984-85 to nearly $55 million in 1992-93. About 80 percent of that funding was distributed to the New York City Board of Education (NYCBE) during each of those years. During the 1993-94 school year, about $47 million will be distributed to the 19 eligible school districts, as part of their comprehensive operating aid. The NYCBE will receive $40.8 million, or 87 percent of the total Program funding. In total, the State has spent nearly $439 million on the Program over the last decade.

Since the Program began, statewide attendance and dropout statistics have improved somewhat. During the 1983-84 school year, the year before the Program went into effect, the statewide average attendance rate, as reported by the Department, was 90.3 percent. By the 1991-92 year, the statewide attendance rate had increased to 91.6 percent. For the decade ended June 30, 1993, attendance rates increased for 56 (80 percent) of the 70 original districts participating in the Program. In comparison, during the same period, attendance rates increased for 71 percent of the non-Program districts. Also, from the 1985-86 year through the 1991-92 year, the reported statewide dropout rate decreased from 5 percent to 4 percent.

The State Comptroller has previously audited aspects of the Program. An audit of the Board of Regents' and the Department's oversight of New York City Schools (Report 88-S-182, issued July 7, 1988) found that reported improvements in attendance rates were overstated and that the Department needed to increase its oversight of Program performance. Another audit, issued by the Office of the State Deputy Comptroller for New York City (OSDC) in 1987, concluded that Program services were sometimes not documented.

Audit Scope, Objectives and Methodology

We audited the Department's guidance and monitoring of the Program for the period July 1, 1992 through April 30, 1994. As necessary, we also reviewed data from prior years to analyze changes in attendance and dropout rates during the period that the Program has been active. The primary objectives of our audit were to assess the Department's oversight of the Program and to assess the school districts' compliance with laws and regulations regarding the program. We also attempted to determine the extent to which the program has accomplished its intended results, the accuracy of reported program statistics, and the reasonableness of established performance measures.

To accomplish our audit objectives, we reviewed applicable laws and regulations, interviewed appropriate Department and school district officials, analyzed the Department's school district files, reviewed attendance and dropout documents and statistics, researched publications,

and interviewed other education authorities from outside departments, and organizations. Our audit included a review of the Department's central office in Albany, and also included site work at the New York City Board of Education (NYCBE) and the Buffalo City School District, the districts with the two largest Programs in the State. To assist us with our review at the NYCBE, we obtained input from NYCBE officials regarding the selection of the sites we visited and the students whose records we reviewed.

We conducted our audit in accordance with generally accepted government auditing standards. Such standards require that we plan and perform our audit to adequately assess those operations of the Department and selected districts which are included within the audit scope. Further, these standards require that we understand the Department's and districts' internal control structures and compliance with those laws, rules, and regulations that are relevant to the Department's and districts' operations which are included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments, and decisions made by management. We believe our audit provides a reasonable basis for our findings, conclusions and recommendations.

We use a risk-based approach when selecting activities to be audited. This approach focuses our audit efforts on those operations that have been identified through a preliminary survey as having the greatest probability for needing improvement. Consequently, by design, finite audit resources are used to identify where and how improvements can be made. Thus, little audit effort is devoted to reviewing operations that may be relatively efficient or effective. As a result, our audit reports are prepared on an "exception basis." This report, therefore, highlights those areas that need improvement and does not address activities that may be functioning properly.

Response of Officials to Audit

Draft copies of this report were provided to Department officials for their review and formal comment. Their comments have been considered in preparing this report and are included in Appendix B.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of Education shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

Department Guidance and Monitoring

To administer the Program, the Department has established a system of annual Program implementation plans and reports on the attendance and retention rates of the participating school districts. To help ensure that funds spent on the Program achieve the most favorable results, the Department needs to ensure that districts submit adequate implementation plans and reliable reports. The Department also needs to provide effective guidance and feedback to the districts.

Although the Program has contributed to some statewide improvement in student attendance rates, we concluded that the Department can improve overall Program effectiveness by strengthening its practices for guiding and monitoring districts' Program efforts. Specifically, senior Department management should ensure that:

- participating districts submit Program plans and reports, as required by the Law;
- the districts' plans adequately address all key Program components;
- Department staff review districts's Program plans on a timely basis;
- attendance and dropout statistics reported by the districts are reliable; and
- districts' Program reports provide adequate information on performance objectives and program outcomes. Such information should be included in the Department's annual Program report to the Legislature.

Receipt of Districts' Plans and Reports

The Law and Subpart 149-2 of the Regulations require each Program-eligible school district to submit annually a plan that details how it will implement its Program. The plan should be submitted to the Department by July 15 of the school year covered by the plan.

The Law also requires each eligible district to file a Program report by July 30 following the school year. The Department distributes forms to the districts to use in preparing their reports. The purpose of the reports is to provide Department officials with information about the districts' attendance and retention rates. Department officials use the data from the districts' reports to prepare an annual report on the Program, which the Law requires the Department to submit to the Legislature.

For the 1993-94 school year, 19 school districts, including the NYCBE, were required to set aside funding for the Program. Within the NYCBE, Program participants included the 30 community school districts (including the district for special education) and the Division of High Schools. Each of NYCBE's community school districts and the Division of High Schools are required to prepare a Program implementation plan and completion report. Therefore, in the 1993-94 year, the Department should receive 49 plans and reports - 31 from the NYCBE and one from each of the other 18 districts.

We reviewed the Department's Program files for the 1993-94 year and found that 43 of the 49 district plans had been received as of February 2, 1994. However, the plan of the remaining six school districts (Albany, East Ramapo, Longwood, Newburgh, Niagara Falls and Yonkers) were about five months overdue. Also, the Longwood district had not submitted a plan for the 1992-93 year. (Note: Subsequent to February 2, 1994, the Niagara Falls and Yonkers districts submitted their plans. We included these two plans in our tests of adequacy and completeness as detailed subsequently in our report. Thus, the plans of 45 districts were available for our review.)

Prior to 1993-94, the Department should have received Program plans and reports from the NYCBE districts and 69 other districts from around the State. However, we found that, for 1992-93, the Department had not received final Program reports from 15 districts. (Note: Seven of these 15 districts had submitted interim Program reports to the Department.) Although several districts had not submitted the required Program plans and/or reports, the Department has provided them with about $2.6 million in Program funding over the past two school years.

According to Department officials, the plans and reports are the only consistent communication the Department has with the participating districts. Without these documents, we question whether Department staff can properly assess the extent to which a district's Program has succeeded in improving attendance and reducing dropout rates. Without information from certain districts, we also question whether the Department's annual report can provide the Legislature with all of the information necessary to make informed decisions regarding current and future legislation which affects the Program.

Recommendation

1. Ensure that districts submit Program plans and reports timely, as required by the Law.

Review of Districts' Program Plans

The Law and the Regulations require that each district's plan specify measurable performance goals and outcomes for the improvement of pupil performance, attendance and student retention. The Law and Regulations also prescribe that each district's plan include 12 components, including the district's description of its procedures for reviewing students' attendance and academic records during the two-year period prior to high school. Another component requires an examination of district Program practices to determine their effectiveness in achieving Program objectives.

We reviewed districts' Program plans to determine whether they included all 12 components prescribed in the Law and the Regulations. For the 1993-94 year, only 1 of the 45 plans we reviewed had all of the required components. The remaining 44 plans lacked between one and seven of the prescribed elements.

For example, 26 district plans did not include detailed procedures for reviewing attendance and academic records for all students during the two-year period prior to high school. Twenty-four plans did not identify how the district would perform the required examination of district practices to determine their effectiveness.

Further, Department staff had reviewed only 8 of the 44 Program plans submitted by the districts as of February 28, 1994, six months after the plans were due, and more than halfway through the 1993-94 school year. (Note: For the 1993-94 year, the Regulations required districts to submit their plans by September 1, instead of July 15.) Consequently, we question whether many districts had effective Program plans and whether the Department could follow-up timely with those districts whose plans were not complete.

We also reviewed the 1993-94 plans of the 14 upstate districts (that had submitted plans) to determine if those districts' plans included meaningful Program performance goals and outcomes. We found that these districts' plans frequently did not contain meaningful performance goals and outcomes. Further, some districts' plans did not set specific goals for

all three of the required elements: pupil performance, attendance, and student retention.

For example, the prescribed goals and outcomes of many districts were very general. One district's goal was to have its target population improve its attendance from the prior year. Consequently, the slightest improvement in the target population's attendance, at that district, could technically be cited as program success. However, we believe that reaching a general goal of "improved attendance" without achieving any specific target may provide a false sense of program success, because a small increase in attendance may be caused by non-Program factors.

Department officials stated that they have not developed a uniform set of Program goals and outcomes due to the unique conditions which may exist at certain districts. Although we acknowledge that unique conditions could cause goals and outcomes to vary from district to district, we do not believe that unique conditions obviate the need for formal Program objectives and standards for measuring success. Moreover, education professionals, who we consulted, agreed that using specific goals and measurements would help a district assess the Program's effectiveness, as long as those goals are specific to the district's environment and are realistic and achievable.

Without measurable goals and objectives, we question whether district and Department officials can adequately assess the effectiveness of the districts' Programs. To help ensure that districts establish meaningful performance goals, the Department needs to provide districts with technical guidance that illustrates how appropriate goals and outcomes should be developed.

Recommendations

2. Provide technical guidance to the districts to help them to prepare effective Program plans, including measurable and meaningful performance goals. Such guidance could include the use of model plans.

3. Establish minimum standards for assessing the adequacy and effectiveness of districts proposed Program plans.

4. Ensure that the districts' plans address all of the Program components, as prescribed by the Law. Follow up timely with those districts whose plans are missing any of the prescribed components.

5. Ensure that the performance goals and outcomes that are set forth in the districts' plans address all the elements prescribed by the Education Law: pupil performance, attendance, and student retention.

Assessment of Districts' Reported Results

One purpose of the districts' Program reports is to provide the Department with information regarding the districts' attendance and retention rates. The Department uses this information to monitor the districts' programs, and includes statistical data in the Commissioner's annual report to the Legislature regarding the districts' improvement in attendance and student retention.

Based on our review of the districts' reports, we conclude that the Department cannot accurately determine if the districts are actually raising their attendance rates and reducing their dropout rates. We found that the Department does not receive enough information from districts to properly assess each Program's effectiveness. In addition, Department officials do not have adequate assurance that the attendance and dropout data reported by districts is accurate and reliable.

On the Program report forms, the Department requires that districts report statistical data regarding their programs, but not information on their progress toward meeting the program goals set forth in their plans. As a result, Department staff review the performance goals in the plans, but have no means to determine whether school districts are achieving them. Further, while Department forms request attendance and dropout

data, they do not request data on pupil performance, one of the performance measures identified in the Law.

To test the accuracy of districts' reported attendance statistics, we visited two districts, the NYCBE and the Buffalo City School district, to review attendance procedures and test attendance data. As detailed in a subsequent section of this report, we found examples of discrepancies between source documents and the official attendance records. For some students, the official attendance records contained far fewer absences than were shown on source documents.

We also found that districts are not recording and reporting attendance data consistently. For example, we found that some schools record student tardies while others do not. Also, some schools take attendance after the first period of classes, while others take attendance prior to the first period.

Department officials told us that, although district attendance rates are desk-reviewed (which includes scanning for obvious irregularities), they do not have other procedures to verify their accuracy. Department officials further informed us that they have not performed field audits of district attendance reporting procedures since about 1990, primarily because of staff reductions and reassignments.

Because the Department does not receive information on districts' performance goals and outcomes and because the reliability and uniformity of district-reported attendance and dropout data is questionable, we believe that the Department has limited ability to accurately assess Program outcomes. Moreover, the Department may not be able to provide the Legislature with the information it needs to make informed decisions regarding legislative actions which could affect the Program.

Department officials advised us that they will be better able to guide and monitor districts' attendance improvement and dropout prevention initiatives now that 19 districts (instead of 70) are participating in the Program. They further indicated that the Department's field services teams could be used to provide increased guidance to and monitoring of the districts.

Recommendations

6. Establish a standard method for the districts to report attendance and dropout data to facilitate more meaningful analysis of Program performance indicators.

7. Provide districts with guidance to help ensure that reported attendance and dropout data is reliable enough to assess Program performance.

   Department officials agreed with the recommendation. However, they also indicated that such guidance would be limited by the lack of available expertise within the Department and the lack of funds to support on-site visits.

8. Encourage districts to develop procedures to periodically verify, on a test basis, the accuracy of the attendance and dropout data submitted to the Department.

Review of District Programs

New York City Board of Education

The NYCBE distributes Program funds among 30 Community School Districts (CSDs) and 34 Project Achieve high schools. For the 1993-94 school year, the NYCBE allocated $40.8 million for its Programs. NYCBE's Program funds are spent on salaries, equipment, and other non-personal service items. Of the $40.8 million allocated for the overall Program effort, NYCBE budgeted $20.4 million for the CSDs, $17 million for Project Achieve and $3.4 million for other Program services and administrative costs.

The NYCBE's reported dropout rates have decreased from 8.8 percent in the 1985-86 year to 6.2 percent in 1991-92. The NYCBE's reported attendance rates remained about the same during that period. In 1985-86 the citywide attendance rate was 85.3 percent, while the rate was 85.1 percent in 1992-93.

The NYCBE administers its Program programs for the CSDs and the Division of High Schools separately. Also, although certain components of students' Programs (such as substance abuse, pregnant teen and parenting services) may be individualized, other Program components (such as attendance outreach and guidance counseling) are routinely provided to the general Program population. Attendance outreach activities include phone calls and mailings to parents, home visits, and student attendance incentive programs.

Community School Districts

The CSDs include elementary, middle, and junior high schools. A Program facilitator supervises the Program at each CSD school, and coordinates Program services for a targeted population of students. The schools reported to the NYCBE the Program services they provide through the Monthly Summary of Services Report (Monthly Report). This report quantifies absences, phone calls, mailings, home visits, attendance incentives, guidance sessions, parental involvement and other services provided to Program students.

We visited two elementary, one middle, and two junior high schools located in four CSDs, and asked NYCBE staff to select a sample of ten Program students at each school. (Note: We judgmentally selected the schools we visited based on a review of NYCBE's attendance data and because of time and logistical concerns. Our samples were not chosen for the purpose of statistical projections.) We then tested the accuracy

of pertinent Program data, reported to senior NYCBE and CSD management, regarding services provided to the sampled students.

We determined that officials at the schools we visited provided services to students as prescribed by the Program plans for the CSDs in question. However, we found that, for some of the students we sampled, the monthly reporting of service efforts may not have been accurate. In addition, there was a wide variation in the numbers and types of attendance outreach services provided at each school and to individual students. Consequently, we questioned whether NYCBE officials can be adequately assured that students placed in Programs routinely receive appropriate types and amounts of services.

a) Documentation of Services Provided

The NYCBE required school officials to complete a Monthly Report for each Program student at the CSDs. The Monthly Report is sent to the NYCBE's Office of Student Information Services (OSIS) which inputs the data to a computer system and summarizes it. The summary Monthly Reports are used by the NYCBE and the schools to monitor the number of Program services the schools provide.

For each of the 50 students in our sample, we received a summary of the monthly Program service and attendance data reported on the Monthly Reports for September 1993 through January 1994. At each school, we reviewed available documentation to confirm that the reported Monthly Report data accurately reflected the type and number of Program services provided to each student. For some of the students sampled, we found significant differences between the number of services recorded on the Monthly Report and the number of services supported by documentation at the schools.

The number of discrepancies was greater at some schools than at others. Furthermore, for most of the disparities, the number of services indicated on the Monthly Report summaries was greater than the number of services supported by documentation available at the schools. Specifically, we determined that 184 of 1,258 services (or 15 percent) reported by the Monthly Report were not documented at the schools. In 29 other instances, services documented at the schools were not reported on the Monthly Report. In total, we found 213 discrepancies (184 plus 29) between the number of services reported by the Monthly Report and those supported by documentation at the schools.

For the 50 students in our sample, there was an average of 4.3 discrepancies per student between the Monthly Reports and school documents. Although there were 2 discrepancies or fewer for 31 of the sampled students, the records for 11 students (22 percent) disclosed 7 or more discrepancies. For example, at PS 101, the Monthly Reports for each of three students reported 10 to 15 services, including guidance sessions and attendance incentives, that were not supported by available documentation at the school. These differences may have resulted from errors when the data was input by OSIS.

Subsequent to our fieldwork, NYCBE officials advised us that they were taking actions to improve their procedures for recording and reporting the delivery of Program services, including the use of a new data entry form. In addition, NYCBE staff would be assigned to verify random samples of five to ten percent of the Program services reported.

b) Level of Services Provided

At each of the schools we visited, the schools' Program plans prescribed mailings, phone calls and home visits to follow up on students with attendance problems. However, we found that the Program plans do not prescribe when services should be provided and how often. Thus, school administrators use their own judgment to determine when and how often to provide services.

For our sample of students, we compared the number of documented attendance outreach services provided by the five schools we visited. We found a wide variation in the levels of documented services provided at the schools, as indicated by the following table.

School	Average Absences	Mail	Phone Calls	Home Visits	Total Outreach
IS 70	7.4	67	20	10	97
PS 60	12.9	58	31	35	124
PS 101	13.1	24	53	4	81
JHS 117	13.9	40	13	17	70
JHS 126	18.8	79	30	15	124

As indicated by the table, the schools relied on each of the different outreach services to varying degrees. For example, staff at PS 60 made 35 documented home visits for the 10 students that we reviewed, while staff at IS 70 and PS 101 each made 10 and 4 documented home visits, respectively. However, in our limited sample, there does not appear to

be a relationship between either the total number or the types of outreach services provided, and improved attendance rates.

We also noted some wide variations in the level of services provided to students within the schools that we visited. For example, at PS 101, two students with 26 and 21 absences, respectively, each received one mailing and no phone calls or home visits. (Note: Each of these students was targeted for Program services due to a history of frequent unexcused absences.) In contrast, another student at the same school with 8 absences received 2 mailings and 12 phone calls.

The apparent lack of a relationship between the number and types of outreach services provided and schools' attendance levels, as well as the variation in the levels of services provided, leads us to question how and why officials decide to use specific services. NYCBE and the districts need to determine which services affect student attendance and under which conditions they have the greatest impact. Based on this evaluation, they should develop guidelines for the most effective use of outreach services.

NYCBE officials advised us that Program schools would be directed to provide a minimum average daily number of home visits. Also, the NYCBE would require schools to provide telephone and/or mail outreach daily for unexcused absences.

Project Achieve

In 1990, NYCBE's Division of High Schools (Division) initiated Project Achieve, which was a further development of the Division's existing Program. Project Achieve required that each high school develop smaller internal units called "houses" and integrate all instruction and support services for the students within each house.

Each house is responsible for a portion of a school's student population. House staff are responsible for the attendance improvement and dropout prevention services prescribed by the Program. NYCBE officials expect a house's staff, which includes a coordinator, teachers, guidance counselors and family assistants, to effectively monitor student attendance and achievement because they focus on a comparatively small group of students. A typical house may have several hundred students within a high school with an enrollment of several thousand students. For the 1993-94 year, the NYCBE allocated about $17 million (of the total of $40.8 million budgeted for NYCBE's overall Program) for services at the 34 high schools participating in Project Achieve.

To verify that Program services were provided at Division schools, we judgmentally selected five high schools in the Project Achieve program

and chose two houses to review at each school. For each house, we reviewed the relevant records for a sample of five students selected by school officials as representative of students who received Program services. We also reviewed performance outcome measures established by the Division and by the high schools we visited.

We found that the Project Achieve program is providing students with Program services. However, the formal program descriptions for Project Achieve did not prescribe minimum standards for the types and frequency of attendance outreach and other services that should be provided to Program students. In addition, we sometimes found a lack of documentation to support the delivery of Program services, primarily guidance counseling. Consequently, we question whether students are routinely receiving the appropriate services.

Also, as reported by the NYCBE, the schools we visited had mixed degrees of success in meeting the Chancellor's minimum performance goals. We believe that the development and implementation of formal service delivery guidelines could improve the high schools' abilities to improve students' attendance and meet the Chancellor's performance goals.

a) Provision and Documentation of Program Services

To determine the extent to which Project Achieve high schools provide Program services and document their delivery, we visited the Eastern District, William Howard Taft, Fort Hamilton, Washington Irving, and Martin Luther King, Jr. High Schools. We reviewed a sample of ten students at each of the five high schools we visited. Our samples included five students from two houses at each school. For the 1993-94 school year (through the date of our site visit), we reviewed available documentation to determine if students were receiving attendance outreach services and guidance counseling. Summaries of our reviews at the Taft, Irving, and King High Schools follow.

- At the William Howard Taft High School, we visited the Lex House and the Discovery House. Neither house, however, could provide documentation of guidance services provided to the sampled students since counselors do not document their guidance sessions with students. Without some record of the guidance sessions and their substance, we believe that NYCBE officials do not have adequate assurance that appropriate guidance counseling has been provided to students with serious attendance problems.

Although the Lex and Discovery Houses made phone calls and mailed notices of absences to the parents of the students we sampled, we found no documentation of home visits for the Lex House students. At the time of our visit, these students had from 22 to 51 absences. According to Division officials, home visits can be important because school staff sometimes cannot contact students' parents through phone calls or the mail. Home visits are also used when phone and mail contacts are made, but do not help to improve a student's attendance problems. In these cases, home visits may be needed to involve the parents in efforts to improve the student's attendance and academic achievement.

- At the Washington Irving High School, we visited the Art House and the International House. We found documentation of home visits by family assistants for students in the Art House, but not for the International House students. The International House coordinator told us that she does not require family assistants to make home visits. Also, there was generally no documentation of guidance sessions with the five students at the Art House. A guidance counselor told us that she does not maintain logs of guidance services because the house coordinator does not require them.

- At Martin Luther King High School, we visited the Business House and the Law House. There was no indication of phone calls made to the homes of the five students sampled at the Business House. In addition, there was also no documentation of guidance services provided to three of the five Business House students. Only one of the two guidance counselors, at Business House documents guidance counseling sessions. There was also limited or no documentation of guidance services provided to three of the five students at the Law House. Only one of the Houses's three guidance counselors maintains documentation of guidance services.

As noted earlier in this report, OSDC performed an audit of the Program in high schools in 1987 and found that attendance outreach and guidance counseling services were often not properly recorded or documented. Although the program has changed since that review, we conclude that some of the problems OSDC identified still exist.

In response to a preliminary report, Division officials advised us that technical assistance and staff development would be provided to school personnel to help ensure that attendance outreach services are properly documented.

b) Program Performance Indicators

As previously noted, the Law and the Regulations require school districts to specify measurable performance goals and outcomes for their Programs. In establishing Project Achieve, Division management identified several indicators of overall Program success. These indicators included average daily attendance (ADA) and certain student performance outcomes.

The Division stated that a Program goal was "to improve student performance outcomes and increase successful school completions for at-risk students." To meet this goal, the Division set objectives for the schools to meet that are based on the Chancellor's Minimum Standards (or goals) for attendance and achievement. Schools are expected to meet these goals or, where they do not, to meet intermediate targets that are proposed by the Division. The Division identified two goals which addressed dropout rates and attendance. Specifically, the two goals prescribed:

- High school dropout rates of no more than 10 percent per year.

- ADA of 85 percent for the year ended June 30, 1993. The intermediate target (using the 1988-89 school year as a baseline) was to reduce the difference between the Chancellor's goal of 85 percent ADA (excluding students classified as Long-Term Absent) and a school's average daily attendance rate of 9th and 10th graders by 60 percent over a three-year period.

The NYCBE's Office of Research, Evaluation and Assessment (OREA) issued a summary of Project Achieve outcomes for the three school years ending June 30, 1993. OREA used the 1989/90 year as the baseline for its comparisons. The following tables summarize the reported performance of students in all grade levels in the five schools we visited, and for all Project Achieve schools, with respect to the Chancellor's goals.

Objective / Year / School	Dropout Rate 88/89	90/91	91/92	92/93	Overall ADA Rate 89/90	90/91	91/92	92/93
Eastern Dist.	10.0	9.8	6.0	(1)	75.6	77.4	76.0	72.5
Ft. Hamilton	9.5	7.1	5.0	(1)	84.2	87.0	86.6	86.1
W. Irving	7.0	7.6	6.3	(1)	81.9	81.2	81.8	84.0
M. L. King	8.4	3.1	3.0	(1)	78.1	78.0	81.2	81.7
W. H. Taft	8.2	7.3	6.4	(1)	75.8	79.1	77.9	74.7
All Schls (2)	(3)	5.5	4.8	(1)	84.8	85.4	85.5	84.7

Notes:

(1) 1992-93 rates were not included.

(2) Data for all Project Achieve Schools obtained from a report by the Office of Performance Outcomes.

(3) Data not provided in NYCBE reports.

As the table for dropout rates indicates, all participating schools met the goal of a 10 percent dropout rate for the first two years (1990-91 and 1991-92) of Project Achieve. However, four of the five schools we visited did not meet the minimum goal of 85 percent ADA. Fort Hamilton met the goal each of the three years of Project Achieve, and Washington Irving improved from 82 percent to 84 percent. However, at Eastern District and Taft, the overall ADA rates actually decreased from the baseline year.

The Project Achieve objectives also called for the schools to meet the minimum goal of 85 percent ADA, or the intermediate targets, for ninth and tenth graders. However, as indicated by the following table, none of the schools we visited met the minimum goal for ninth graders or the intermediate target by 1992-93.

Objective / Year / School	Ninth Grade ADA Rate 89/90	90/91	91/92	92/93	Tenth Grade ADA Rate 89/90	90/91	91/92	92/93
Eastern Dist.	71.3	73.3	71.6	68.6	78.8	79.9	79.0	74.7
Ft. Hamilton	82.9	85.7	84.4	83.6	82.8	86.0	87.2	87.0
W. Irving	78.2	76.3	78.3	80.6	79.9	81.7	81.9	84.9
M. L. King	75.1	74.4	78.8	79.2	79.8	79.3	82.1	82.7
W. H. Taft	71.4	76.4	74.9	69.7	79.9	81.7	81.3	77.7
All Schools	(Rates not included in NYCBE reports)							

For tenth graders, Fort Hamilton reported an 87 percent ADA rate for 1992-93, which exceeded the minimum goal. However, the other four schools did not reach the goal, although Washington Irving exceeded its intermediate target for 1992-93.

The ADA rates at our sampled Project Achieve schools show varying results: some improved, some grew worse, and others remained about the same. We believe these varied outcomes demonstrate the need to evaluate program services to determine which ones are the most effective in improving attendance.

Division officials told us that a main goal of Project Achieve was to produce long-term positive results. They further noted that the program began in 1990, and consequently, the full benefit of the program might not yet have been realized.

In addition, the principal at one high school we visited stated that certain factors, beyond the control of school administrators, have a major impact on efforts to meet the Chancellor's minimum attendance goals. These factors include the following:

- A high student mobility rate. The student mobility rate represents the proportion of students who transfer to and from schools during the school year;

- A large influx of students from other countries whose attendance and academic habits were not good; and

- Weak attendance habits of students prior to entering high school.

We acknowledge that certain factors beyond the control of school administrators can contribute to poor student attendance. However, we believe that administrators should anticipate and include such factors in their efforts to identify and provide the services which have the most potential to increase student attendance.

Subsequent to our review, Division officials advised us that they were revising their Program guidelines for providing attendance outreach services to students. The revised guidelines would delineate when outreach services should be provided.

Recommendations

9. Encourage districts to develop and implement written policies and procedures to help ensure that Program services provided are adequately documented and accurately summarized and reported to senior district management. In addition, the districts should have procedures to periodically verify Program data to supporting documentation.

10. Work with NYCBE and the districts to evaluate and assess the various Program outreach services and determine which services should be used, and when, to achieve the greatest impact on attendance and dropout rates.

11. Work with NYCBE and the districts to develop guidelines which prescribe minimum standards for the appropriate use of such Program services.

Buffalo City School District

The Buffalo City School District (District) budgeted about $1.2 million in Program funds for the 1993-94 school year to be allocated among 37 schools. The District's Program initiative is part of a broader, districtwide program to assist students with serious academic problems, which are often attendance-related. However, the Alternative High School (Alternative) and the Fulton Parent/Child Center (Fulton) were designated to receive the majority of the District's Program funds. Students who attend Alternative and Fulton generally have a higher risk of attendance-related problems than students who attend the District's other schools.

The District's 1993-94 plan has three major Program segments: one for Fulton, one for Alternative and another for districtwide use. The District has developed a program description for each Program segment. We visited the District's central administration, the Fulton and Alternative schools and the Hillary Park Academy (Hillary Park), which follows the districtwide Program plan.

We conclude that District management needs to improve its administration of the Program to help ensure that the program is fulfilling its prescribed goals and objectives. Specifically, we found that information maintained on the District's computerized attendance database was not adequately reliable for many of the students we sampled. In addition, we found a lack of documentation to support the delivery of prescribed services to students at the Alternative and Fulton schools.

Computerized Attendance Records

A school district's ADA rate is a factor for determining its eligibility for the Program, a factor in the amount of State aid it receives, and a potential measurement for assessing its Program performance. The Director of Attendance is responsible for ensuring that accurate attendance data is available for the District's various reporting needs. However, we found that the reliability of the District's computerized attendance database, which is the source of the District's official attendance records, is questionable.

For each student, the District maintains a "traveler card" which is a manually-maintained document that is used to record a student's attendance. For a judgmental sample of 38 students, we compared information on the traveler cards to the District's computerized attendance database for September 1993 through February 1994, the time of our visit. We found discrepancies between the cards and the database for 29 (76 percent) of the 38 students in our sample.

In general, the discrepancies resulted from absences and late arrivals (tardies) that were recorded on the traveler cards, but were missing from the automated attendance system database. For example, we determined that for one student in our sample, the automated system did not include 10 absences and 8 tardies that were recorded on the student's traveler card. Currently, the District does not have a procedure to verify the accuracy of the computerized attendance system data to students' traveler cards.

For the 29 students whose records had discrepancies, the automated database contained 76 fewer absences (net) and 160 fewer tardies (net) than were shown on the students' traveler cards. Discrepancies included 108 absences that were noted on students' traveler cards but were not on the automated system and 32 absences that were on the system, but were not on the traveler cards. We noted that the records of 15 students had six or more discrepancies. Two (of these 15) students' records contained over 30 discrepancies each.

School officials are required to record instances of student tardiness, as well as absences, on the attendance system. However, we found inconsistencies in the practices used at the Alternative school. For example, we found that staff at Alternative were not recording all student tardies on the computer system. The former principal at Alternative had instructed staff not to enter tardies, a practice staff were still following at the time of our site visit. Alternative's current principal was not aware that tardies were not being recorded. Furthermore, students participating in a special program (STOP) at Alternative are sometimes recorded as absent, although they are actually present.

Buffalo officials attributed some of the attendance data problems to the District's student mobility (transfer) rate, which is about 40 percent. Officials also advised us that procedures would be established to verify automated attendance data to students' traveler cards.

Comparison of Actual District Practices to Program Plans

At the Fulton and Alternative schools, we reviewed judgmentally selected samples of students to determine whether their records documented the provision of required services.

For Fulton, the plan states that each pupil should have an individualized remediation program and that individual remedial efforts should be described and documented in each pupil folder. We believe that these policies were prescribed to help ensure that the necessary actions were taken to improve a student's attendance and related problems. However, we reviewed the folders of five Fulton pupils and found no documentation of the students' individualized programs or any evidence that remedial activities actually took place.

According to the District's plan, Alternative students should receive individual and group counseling from school guidance counselors. Furthermore, referrals are to be made to community agencies and organizations for pupils and their families to receive additional assistance. Furthermore, the plan stated that each student at Alternative should demonstrate improved attendance when compared to the previous year without the special services of Alternative. We reviewed the folders of 20 students at Alternative and found that:

- 8 of the 20 files contained no documentation of counseling provided;

- 19 files contained no documentation of referrals to outside agencies (such as community based organizations and government agencies); and

- none of the files contained documentation of improvement in the student's attendance.

Consequently, we believe that Alternative and District officials do not have adequate assurance that the 20 students were appropriately placed in the program and received the necessary counseling and other support services.

The Law and Regulations also require districts to attempt to enlist the active support and participation of the parents of students placed in the Program. Consequently, District officials should identify and contact the parents of these students. However, of the 25 student files we reviewed at Alternative and Fulton, we found that 9 files did not contain evidence

that District officials obtained (or tried to obtain) parental support. Officials at Alternative stated that it is often difficult to get parental involvement for the students because of the comparatively higher ages of many students at this school.

Subsequent to our review, District officials advised us that a significant amount of attendance-related data existed for each student, however, such data was not maintained in a central location. As such, District officials were exploring ways to centralize attendance data for audits and other official business.

Follow-up Calls for Absences

The districtwide segment of the plan states that parents are to be contacted daily by attendance or teacher aides when pupils are absent from school. According to a District official, this means a call should be made home for every day a student is absent. The aides are to determine whether pupil absences are legal or not, and identify pupils with attendance problems for possible follow-up. From a judgmental sample of 36 students selected from six District schools, we determined that aides made follow-up calls for 188 (34.4 percent) of the 547 days these students were absent from September 1993 through February 1994.

We found that staff at Hillary Park often did not follow-up on student absences. In fact, we determined that Hillary Park staff followed up on the absences of only two of seven children whose traveler cards we reviewed for the 1993-94 year. Although the traveler card of one student listed 15 absences, there was no indication of any follow-up by Hillary Park staff. We believe that Hillary Park staff did not have an effective system to target follow-up efforts on those students with the more serious attendance problems.

The Department did a review of the District in December 1991 and concluded that it was not practical to call the home of every student who is absent. Instead, the Department recommended that the District should target its follow-up phone call efforts to the homes of students who have significant total absences, a pattern of absences, or are absent for a number of consecutive days. However, the schools we visited did not have formal procedures to target follow-up calls to the homes of students with the more serious attendance problems.

Recommendations

12. Advise districts to develop formal procedures to ensure that all absences and instances of tardiness are properly recorded, summarized and reported by the districts' attendance control systems. Request the districts to review and correct attendance discrepancies identified in this report.

13. Advise districts to periodically verify the accuracy of the computerized attendance database information to appropriate source documents.

14. Periodically verify districts' compliance with significant program components of their Department-approved plans. This should include (but not be limited to) ensuring that:

    - there is adequate documentation that services prescribed by individualized remediation plans were provided;
    - efforts to enlist the participation of parents (through meetings or home visits, for example) are documented; and
    - follow-up phone calls are made to the parents/ guardians of students with the more significant attendance problems.

    Department officials agreed with the recommendation. They added, however, that fiscal resources would not be available to support the travel needed to verify compliance.

State Education Department
Attendance Improvement and Dropout Prevention Program
Summary of Participating Districts and Program Funding Amounts
For the 1993-94 School Year

District	Amount
New York	$40,834,005
Buffalo	1,230,460
Rochester	1,161,372
Syracuse	539,629
Yonkers	341,907
Brentwood	270,133
Newburg	257,822
William Floyd	235,820
Middle Country	219,186
Mount Vernon	217,274
Utica	198,680
Longwood	194,502
Schenectady	193,341
East Ramapo	192,445
Niagara	187,692
Albany	148,539
Middletown	142,878
Kingston	138,617
New Rochelle	132,043

Exhibit A

Major Contributors to This Report

Robert Blot
David R. Hancox
Henry Kagan
Robert Lindholm
Brian Mason
Thomas Riley
Kristee Iacobucci
Nadine Miranda
Patrick Hall

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, N.Y. 12234

EXECUTIVE DEPUTY COMMISSIONER OF EDUCATION
THE NEW YORK STATE EDUCATION DEPARTMENT
ALBANY, NEW YORK 12234

April 6, 1995

Mr. Robert Blot
Audit Director
Office of the State Comptroller
Alfred E. Smith State Office Building
Albany, New York 12236

Dear Mr. Blot:

Thank you for the opportunity to review and respond to the draft audit report (94-S-48) entitled, "State Education Department - Administration of the Attendance Improvement and Dropout Prevention Program." Our enclosed response presents the Department's position on the report and its recommendations. The New York City Board of Education may provide additional information which we will send to you under separate cover.

Should you have any questions concerning the Department's response, please contact John Soja at 474-0933.

Sincerely,

Thomas E. Sheldon

Enclosure
cc: James Kadamus
Concetta Sullivan
Rebecca Gardner

Report 94-S-48
STATE EDUCATION DEPARTMENT
ADMINISTRATION OF THE ATTENDANCE IMPROVEMENT
AND DROPOUT PREVENTION PROGRAM

State Education Department Response

Report 94-S-48 concerning the State Education Department's administration of the Attendance Improvement and Dropout Prevention (AI/DP) Program presents a comprehensive description of program implementation with a particular emphasis on operations during the 1993-94 school year. The information contained in the report accurately portrays the status of program administration at the time the audit was conducted. It should be noted that throughout the ten-year history of AI/DP, there have been no State funds provided for administration and oversight; consequently, both the personal service and non-personal resources available for program administration have been limited. Listed below are the recommendations in the order that they appear in the draft report. For each of the recommendations, a response is included.

1. Ensure that districts submit Program plans and reports timely, as required by Law.

We agree with the recommendation. Application materials were sent to eligible school districts in June 1994 and telephone follow-up was initiated with those districts which did not submit their plans by September 1, 1994.

2. Provide technical guidance to the districts to help them to prepare effective Program plans, including measurable and meaningful performance goals. Such guidance could include the use of model plans.

We agree with the recommendation. Technical assistance was offered to districts in June 1994 when the application materials were sent. Districts which contacted the Department were advised to concentrate their efforts on the identification of measurable and meaningful performance goals. In some instances examples of performance goals or model plans were shared with districts.

3. Establish minimum standards for assessing the adequacy and effectiveness of districts proposed Program plans.

We agree with the recommendation. An AI/DP Setaside Review Form was revised in order to assess the adequacy of proposed Program plans. The final report form (AI/DP 4), which will address the effectiveness of districts' efforts, is currently under revision.

4. Ensure that the districts' plans address all of the Program components, as prescribed by the Law. Follow up timely with those districts whose plans are missing any of the prescribed components.

We agree with the recommendation. The AI/DP Setaside Review Form, noted above, was revised with this purpose in mind. Districts whose plans are not complete are contacted by telephone.

5. Ensure that the performance goals and outcomes that are set forth in the districts' plans address all the elements prescribed by the Education Law: pupil performance, attendance, and student retention.

We agree with the recommendation. However, it should be recognized that improvement in attendance has been the focal point of most AI/DP programs. The Department has stressed the need to broaden the range of performance goals and outcomes and to link AI/DP eligible students with existing resources both in the school and in the community. It should also be noted that the performance goals and outcomes for New York City building-based programs address all of the areas prescribed in Education Law, and New York City accounts for approximately 87 percent of AI/DP setaside funds.

6. Establish a standard method for the districts to report attendance and dropout data to facilitate more meaningful analysis of Program performance indicators.

We agree with the recommendation. The final report form (AI/DP 4) will be reviewed and revised; however, it should be recognized that many districts use some of their funds at the elementary level where dropout data do not exist due to compulsory attendance laws.

7. Provide districts with guidance to help ensure that reported attendance and dropout data is reliable enough to assess Program performance.

We agree with the recommendation. However, the provision of this type of technical assistance is limited by the lack of available expertise within the Department and the lack of funds to support on-site visits due to the lack of State funds to provide for administration and oversight.

8. Encourage districts to develop procedures to periodically verify, on a test basis, the accuracy of the attendance and dropout data submitted to the Department.

We agree with the recommendation. Such encouragement will be communicated to districts.

9. Encourage districts to develop and implement written policies and procedures to help ensure that Program services provided are adequately documented and accurately summarized and reported to senior district management. In addition, the districts should have procedures to periodically verify Program data to supporting documentation.

We agree with the recommendation. Districts will be encouraged to develop written policies and procedures concerning program documentation; however, it should be noted that the Legislature adopted the "setaside approach" in part to reduce the burden of paperwork on school districts.

10. Work with NYCBE and the districts to evaluate and assess the various Program outreach services and determine which services should be used, and when, to achieve the greatest impact on attendance and dropout rates.

We agree with the recommendation. Department staff will contact NYCBE to discuss how data concerning outreach services can be used to increase the effectiveness of such services.

11. Work with NYCBE and the districts to develop guidelines which prescribe minimum standards for the appropriate use of such Program services.

We agree with the recommendation. NYCBE has already directed AI/DP funded schools to provide a daily minimum average of eight to 10 home visits. Other minimum standards may be established in the future.

12. Advise districts to develop formal procedures to ensure that all absences and instances of tardiness are properly recorded, summarized and reported by the districts' attendance control systems. Request the districts to review and correct attendance discrepancies identified in this report.

We agree with the recommendation. Districts will be so advised.

13. Advise districts to periodically verify the accuracy of the computerized attendance database information to appropriate source documents.

We agree with the recommendation. Districts will be so advised.

14. Periodically verify districts' compliance with significant program components of their Department-approved plans. This should include (but not be limited to) ensuring that:

- there is adequate documentation that services prescribed by individualized remediation plans were provided;
- efforts to enlist the participation of parents (through meetings or home visits, for example) are documented; and
- follow-up phone calls are made to the parents/guardians of students with the more significant attendance problems.

We agree with the recommendation. However, fiscal resources are not available to support the travel effort needed to verify compliance.